

PILLSBURY WINTHROP SHAW PITTMAN LLP
MICHAEL CHIBIB, P.C. (admitted *pro hac vice*)
michael.chibib@pillsburylaw.com
401 Congress Ave., Suite 1700
Austin, TX 78701-3797
Telephone: 512.580.9609
Facsimile: 512.580.9601

PILLSBURY WINTHROP SHAW PITTMAN LLP
JEFFREY D. WEXLER (SBN 132256)
jeffrey.wexler@pillsburylaw.com
TIMOTHY RAWSON (SBN 304755)
tim.rawson@pillsburylaw.com
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
Telephone: 213.488.7100
Facsimile: 213.629.1033

Attorneys for Plaintiff and Counterdefendant UM
CORPORATION and Counterdefendant GOLDEN
MEDIA GROUP, INC. and TIGA
ENTERTAINMENT COMPANY, LTD.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UM CORPORATION, a Japanese
corporation,

Plaintiff,

v.

TSUBURAYA PRODUCTIONS CO.,
LTD., a Japanese corporation,

Defendant.

Case No. 2:15-cv-03764-AB (AJWx)

**WITNESS LIST OF PLAINTIFF
AND COUNTERDEFENDANT UM
CORPORATION AND
COUNTERDEFENDANTS GOLDEN
MEDIA GROUP, INC. AND TIGA
ENTERTAINMENT COMPANY,
LTD.**

AND RELATED CROSS-CLAIMS

Pretrial Conf.: October 20, 2017
Trial: November 7, 2017

Pursuant to Local Rule 16-5 and the Court’s November 5, 2015 Order re Jury Trial [Dkt. 38], plaintiff and counterdefendant UM Corporation (“UMC”) and counterdefendants Golden Media Group, Inc. (“GMG”) and TIGA Entertainment Company, Limited (“TIGA”) hereby submit their Witness List. An asterisk identifies those witnesses who will be called only if the need arises.

Witness’s Name, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony
Perasit (“Pete”) Saengduenchai [resident of Japan; may be contacted through counsel for UMC]	Background on Ultraman and the 1976 Agreement; the facts and circumstances surrounding his personal knowledge of the existence of the 1976 Agreement prior to 1996; Sompote’s efforts to exploit the rights granted under the 1976 Agreement; the facts and circumstances leading up to the 1996 Apology Letter; the formation of UMC; and the assignment of rights from Sompote to UMC. Unique in that he is the only person with specific knowledge of the facts	2 hours	2 hours [combined direct and cross-examination]	

	regarding the 1976 Agreement.			
Sompote Saengduenchai [resident of Thailand; by trial testimony from Japanese and Thai proceedings]	Relationship between Sompote and Eiji Tsuburaya; relationship between Sompote and Noboru Tsuburaya, the signatory to the 1976 Agreement; financial condition of TPC in the mid-1970s and the debt owed by TPC to Sompote that Sompote forgave in exchange for the rights granted under the 1976 Agreement; Sompote's efforts to exploit the rights granted under the 1976 Agreement; and negotiations leading up to the 1996 Apology Letter. Unique because he entered into the 1976 Agreement.	2 hours	1 hour [TPC will seek to exclude Mr. Sompote's testimony as a witness.]	
Takashi Ejiri [expert witness and resident of Japan; may be contacted through counsel for UMC]	Expert testimony on general business practices in Japan in mid-1970s with regard to the use of a Hanko seal on	0.5 hours	.5 hours	

	contracts in Japan. Unique because he is the only Japanese-law expert testifying as to these practices and procedures on behalf of UMC, TIGA, and GMG.			
Akitaka Hara [resident of Japan; by videotaped deposition]	The financial condition of TPC in the mid-1970s, and the reasons for its financial condition; TPC's plans with regard to Ultraman in the mid-1970s; and the identification and dates of certain Ultraman works and characters. Unique because of his knowledge of the details around the many Ultraman works.	0.9 hours	N/A [TPC witness]	
Kiyoshi Suzuki [resident of Japan; by videotaped deposition]	TPC's knowledge of the existence of the 1976 Agreement prior to 1996; the financial condition of TPC in the mid-1970s, and the reasons for its financial condition; and facts and circumstances	0.8 hours	.5 hours [TPC will seek to exclude Mr. Suzuki's testimony as a witness.]	

1		surrounding			
2		Sompote's lending			
3		of money to Noboru			
4		Tsuburaya. Unique			
5		because he is the			
6		only witness known			
7		to have had			
8		conversations with			
9		TPC regarding the			
10		1976 Agreement			
11		and the foreign			
12		rights to Ultraman			
13		before 1996.			
14	Daisuke Oto	The validity of the	1.4 hours	.5 hours	
15	[resident of Japan;	1976 Agreement;			
16	by videotaped	discussion with			
17	deposition]	Noboru Tsuburaya			
18		regarding foreign			
19		rights to Ultraman;			
20		Noboru			
21		Tsuburaya's use of			
22		the term "Ultraman			
23		Seven," as opposed			
24		to "Ultra Seven";			
25		background on			
26		Noboru Tsuburaya;			
27		TPC's financial			
28		condition in the			
		mid-1970s; and the			
		facts and			
		circumstances			
		surrounding Noboru			
		Tsuburaya's receipt			
		of a significant			
		amount of money			
		from his Thai friend			
		at the Thai airport.			
		Unique because he			
		is the only witness			

	with knowledge of Noboru Tsuburaya's statements about the rights to Ultraman for the Thai individual, and the only witness with personal knowledge of Noboru Tsuburaya's usage of the term "Ultraman Seven."			
Moriaki Uematsu [resident of Japan; may be contacted through counsel for UMC]	Knowledge of the 1976 Agreement before 1996; background knowledge of Sompote; and formation of UMC. Unique because he is the only witness with knowledge of specific facts surrounding discussions with Sompote shortly after the 1976 Agreement was entered into.	1.5 hours	1.5 hours [combined direct and cross-examination]	
Kiyotaka ("Jimmy") Ugawa [deceased; by trial testimony from Thai proceeding]	The existence of "thousands" of signatures of Noboru Tsuburaya from the relevant time period, and the provision of only a handful of said	0.1 hour	N/A [TPC witness]	

	signatures for handwriting analysis. Unique because he is the only witness with knowledge of the number of Noboru Tsuburaya's signatures that once existed and the selection of Noboru Tsuburaya's signatures for use in the Thai litigation.			
Michael Wakshull [expert witness; may be contacted through counsel for UMC]	Expert testimony on the comparison of signature and letterhead in the 1976 Agreement to "known" signatures and letterhead from the same time period. Unique as the only expert of UMC, TIGA, and GMG testifying as to these topics.	1 hour	1 hour	
Norman Hollyn* [expert witness; may be contacted through counsel for UMC]	Expert testimony on the use of footage from Ultraman Zoffy to create Space Warriors 2000; and expert testimony on the materials required to create audio dubbing in films. Unique as the only	0.5 hours	.5 hours	

	expert of UMC, TIGA, and GMG to testify as to these topics.			
Roy McAree* [may be contacted through counsel for UMC]	Background on GMG. Unique as the only witness for GMG.	0.5 hours	.5 hours [combined direct and cross-examination]	
Sittichai Rujipasakul* [resident of Thailand; may be contacted through counsel for UMC]	Background on TIGA. Unique as the only witness for TIGA.	0.5 hours	1 hour [combined direct and cross-examination]	
Thanisa Tiranasawadi* [resident of Japan; may be contacted through counsel for UMC]	Formation of UMC; and background on UMC. Unique as one of very few people involved in the formation of UMC.	0.5 hours	1 hour [combined direct and cross-examination]	

Dated: September 22, 2017

MICHAEL CHIBIB, P.C.
JEFFREY D. WEXLER
TIMOTHY RAWSON
PILLSBURY WINTHROP SHAW
PITTMAN LLP

By: */s/ Jeffrey D. Wexler*

Jeffrey D. Wexler
Attorneys for Plaintiff and Counterdefendant
UM CORPORATION and
Counterdefendants GOLDEN MEDIA
GROUP, INC. and TIGA
ENTERTAINMENT COMPANY, LTD.